

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT TENNESSEE  
NASHVILLE DIVISION

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TENNESSEE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
on behalf of itself and its  
members, et al.,

Plaintiffs      Civil Action No. 3:20-cv-01039  
                  JUDGE CAMPBELL  
vs.              MAGISTRATE JUDGE FRENSLEY

WILLIAM LEE, in his official  
capacity as Governor of the  
State of Tennessee, et al.,

Defendant

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VIDEO RECORDED DEPOSITION OF:

MARK GOINS

Taken on behalf of the Plaintiffs

Tuesday, June 18, 2024

9:37 a.m.

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10 and

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12 Aseem Mulji, Esq.  
13 Gicola Lane, Restore Your Vote Advocate  
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## I N D E X

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1           The video recorded deposition of MARK GOINS was  
2 taken by counsel for the Plaintiffs pursuant to notice,  
3 at the offices of Baker, Donelson, Bearman, Caldwell &  
4 Berkowitz, PC, 1600 West End Avenue, Suite 2000,  
5 Nashville, Tennessee, commencing at 9:37 a.m. on  
6 Tuesday, June 18, 2024, for all purposes under the  
7 Federal Rules of Civil Procedure.

8           The formalities as to notice, caption,  
9 certificate, et cetera, are waived. It is agreed that  
10 Virginia Dodge, being a licensed court reporter and  
11 notary public for the State of Tennessee, may swear the  
12 witness, and the reading and signing of the completed  
13 deposition was not discussed.

14                         \* \* \*      \* \* \*      \* \* \*

15           THE VIDEOGRAPHER: This is the video  
16 deposition taken of Mark Goins on 6/18/2024 at the time  
17 indicated on the video screen, which is 9:37 a.m. Full  
18 introduction has been waived.

19           Would the court reporter please swear in the  
20 witness and counsel introduce themselves.

21                         (Witness sworn or affirmed.)

22           ATTORNEY HAYNES: I am Keeda Haynes,  
23 K-E-E-D-A H-A-Y-N-E-S, counsel for the plaintiff.

24           ATTORNEY BARKER: Zachary Barker of the  
25 Tennessee Attorney General's office, counsel for the

1 I can't ask my counsel that.

2           But I believe there was some other  
3 individuals that were involved in that conversation.

4       Q.    Okay. And who did you speak to in your  
5 office?

6       A.    Beth, Andrew, Michael, Janet.

7       Q.    And are all these lawyers in your office?

8       A.    Yes.

9       Q.    Okay. Okay. And so what was the decision  
10 that your office made as to what the definition of full  
11 rights of citizenship included?

12      A.    Right to jury, hold public office, right to  
13 vote, gun ownership and fiduciary.

14      Q.    Okay. And would you say that this was a  
15 significant change from the way that your office had  
16 been doing things before?

17      A.    Certainly it was -- yes. I mean Falls v.  
18 Goins put the focus on full rights of citizenship.  
19 That's something that we had not focused on before.

20      Q.    So would you say that it was a significant  
21 change from the way that you all had been operating  
22 before?

23      A.    Yes.

24      Q.    Okay. And so you talked about the lawyers  
25 that you talked to in preparation of the decision being

1 made, but who made the actual decision in the office  
2 that those rights that you just listed wouldn't be  
3 included in full rights of citizenship?

4 A. That's an interesting question. Ultimately,  
5 it was me.

6 Q. Okay. You said ultimately it was you. What  
7 do you mean by that?

8 A. The attorneys researched the issue  
9 thoroughly.

10 Q. Okay. And did they give you their opinion,  
11 or did they just, like, say, "Okay. Well, it could be  
12 this, or it could be that," or --

13 ATTORNEY BARKER: Objection. Attorney-client  
14 privilege.

15 I'll instruct the witness not to answer that  
16 question as to any statements made by his attorneys to  
17 him with regard to this.

18 Q. (By Attorney Haynes) So when exactly did  
19 your office make this decision about what full rights  
20 of citizenship included?

21 A. Early January.

22 Q. Do you remember exactly when in January?

23 A. I do not.

24 Q. Okay. Okay. And so when you all were making  
25 this decision, was there anyone that disagreed with